

BROOKHAVEN NATIONAL LABORATORY Safety & Health Services Division INDUSTRIAL HYGIENE GROUP Standard Operating Procedure	NUMBER IH60200
	REVISION FINAL Rev0
SUBJECT: Records Management & Document Retention	DATE 04/13/05
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1.0 Purpose & Scope

This document describes the SHSD Industrial Hygiene Group (IHG) program for record filing and retention of critical administrative and management files, personal exposure monitoring records, hazard assessment reports, computer files, and other similar records. Its purpose is to establish a policy to:

- Identify all records that need to be maintained.
- Consolidate important records into controlled areas and onto secure electronic storage media.
- Ensure proper retention of reports, memo, sampling data, and other appropriate records.
- Organize records to facilitate short-term retrievability & long-term archive.
- Meet all regulatory and contractual requirements for records management & comply with BNL, DOE, OSHA, and EPA data recording/recordkeeping requirements for critical records.
- Comply with the ESH&Q Records Management Procedure DH-ADM-002.
- Provide a uniform protocol for document control of exposure and program documents regarding industrial hygiene hazards.

The ESH&Q Records Management Procedure DH-ADM-002 does not apply to records generated and received prior to May 1, 2000, but the IH Group will maintain all historical records of the IH program status, hazard assessment reports, and exposure monitoring records according to this procedure, regardless of the time period the record was generated at BNL.

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This procedure applies to all records maintained by the IH Group including:

- Applicable records generated by the IH Group, and
- Internal and external records of the BNL IH Program status, employee exposure, area exposure, or hazard assessments received by the IH Group.

2.0 Responsibilities

- 2.1 **Program Administration:** This procedure is administered through the SHSD Industrial Hygiene Group. Members of the SHSD Industrial Hygiene Group are required to follow this procedure.
- 2.2 Other BNL organizations that provide BNL with quantitative IH field monitoring services are required to follow the exposure monitoring record part of this SOP. Records on IH exposure monitoring provided to the IH Group for storage must meet the requirements of this procedure to be stored in the IH Group files.
- 2.3 Organizations may follow equivalent procedures that ensure an equal or superior method of retention for qualitative hazard assessment documentation they generate. They may store qualitative hazard assessment records in their files. If they wish for their qualitative hazard assessment records to be filed in the IH Group's file, then the organization must follow this procedure.
- 2.4 **Industrial Hygiene Professional:** The *Industrial Hygiene Professional* of SHSD and other BNL organizations are to be qualified by their supervision.
 - 2.4.1 When these individuals conduct or supervise Industrial Hygiene personal exposure monitoring, they are responsible for ensuring a quality hazard assessment report is prepared that is:
 - Provided in a timely manner to all appropriate parties.
 - Marked with the appropriate filing code obtained from the ESH&Q Directorate Records Management Procedure Master Filing List.
 - Correctly and completely entered into the BNL IH exposure monitoring database (i.e. *Compliance Suite*[®]).
 - Presented to the IHG *Monitoring Record Custodian* for filing (original records of sampling and analysis).

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2.4.2 When IH Group *IH Professionals* conduct self-assessments, they are responsible for ensuring that appropriate records are filed as per this SOP and also forwarded for entry in the Correspondence and Commitment Tracking System (CCTS) and the Assessment Tracking System (ATS) (refer to subject areas in SBMS).

2.5 ***Industrial Hygiene Group Staff:*** The Industrial Hygiene group staff members are responsible for ensuring that this procedure is followed by:

- Marking records with the appropriate filing code obtained from Appendix 9.1.
- Filing all records generated, received and maintained according to Section 6.

2.6 ***IH Group Administrative Record Keeper:*** The IH Group's administrative assistant position is designated to be responsible for maintaining IH memorandums and program documents in accordance with the Laboratory *Records Management* Subject Area, the ESH&Q *Records Management Procedure*, and this procedure. This person will maintain the *Document Log database*.

2.7 ***IH Monitoring Record Custodian.*** The IH Group's IH Lab Technician position is designated to be responsible for maintaining chain of custody, field sampling sheets, analysis reports, and other exposure assessment records in accordance with this procedure.

3.0 Definitions

3.1 ***BNL IH exposure monitoring database:*** A single, unified electronic database that compiles all industrial hygiene sampling records taken at BNL's Upton location. The current database and previous versions maintained on the SHSD Shared Drive

[\\Bnlnt2\shsd\Industrial Hygiene] include:

- *Compliance Suite* maintained by the SHSD IH Group for data entry by the organization taking exposure assessment samples. Covers all monitoring from 2003 to present.
- *Microsoft Access* databases of airborne IH Hazards, asbestos airborne fiber analysis, and noise area survey and dosimetry data. Cover the period of 1986-2003. (*Note: A R-Base database of asbestos airborne fiber analysis, and some other exposure records existed for the period of records from 1987-1988. The information from this file was included in the Microsoft Access databases and is no longer supported by the IH Group.*)

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- 3.2 **Industrial Hygiene Professional:** A person designated by their Division Manager/Department Chair to conduct industrial hygiene hazard assessments.
- 3.3 **IH Monitoring Record Custodian:** A person designated by the IH Group Leader to maintain exposure monitoring data records in accordance with this procedure and BNL policies. These records include: Lab analysis results, field sampling sheets, Chain-of-Custody records, and other documentation generated regarding quantitative exposure assessments. The *Official* files are kept in Building 120, Room 1-20.
- 3.4 **IH Group Administrative Record Keeper:** A person designated by the IH Group Leader to maintain the memorandum, administrative, and program documents in the *Official* files in Building 120, Room 1-26 and to enter records into the site's document database.
- 3.5 **Record:** Information of any kind and in any form (e.g., paper, photographs, microfilms, and electronic media), created, received, and maintained by individuals and the Laboratory as evidence of its functions, policies, decision, procedures, operations, or other activities. **Record Storage types** applicable to IH Group operations are:
- **Administrative Record:** Any recorded information that serves as the vehicle for management problem solving and decision making, relating to the work of an office. The information can be letters, memoranda, completed forms, directives, reports, photographs, maps, microfilm, motion pictures, computer tapes and disks, and e-mail messages.
 - **Epidemiological Records (ER):** Records that provide significant information about personnel, environmental, health and safety operations; documents where people work and their potential exposure to hazardous materials (such as radiation, chemical, and metals) and chart the various factors that determine the frequency and distribution of diseases in human and other animal populations. The following are primary records required for epidemiological or health assessments: medical; rights and interests; safety and environmental; personnel; human experimentation.
 - **Legal Records:** Records that provide legal proof of a business transaction or mandate the retention of a record for any period due to statutory or regulatory requirements.
- 3.1 **Working copies:** Unofficial records of documentation maintained by IH Group staff for personal reference. This includes, preliminary drafts of documents prior to distribution of a final draft for comments and approval, notes and calculation on scrap paper used in generating hazard assessment reports, copies of reference material from external sources used to develop thoughts and opinions eventually expressed in formal memorandum. This level of records do not require entry into the *Official* files and may be discarded when no longer needed by the generator.

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3.2 **Reference copies:** Records that do not require entry into the Official files may be maintained by IH Group staff for personal reference. This includes: copies of file copy or original documents, text and images copied or downloaded from external sources that increase the individual's knowledge of a subject, copies of governmental regulations, consensus standards, textbooks, and references.

4.0 Prerequisites None. See qualification in Section 7.

5.0 Precautions

Personal Protective Equipment: The use of personal protective equipment to protect personnel when preparing and filing records and reports is not typically required.

6.0 Procedure

- 6.1 **Equipment:** Typical file supplies (including: file cabinets, folders, computers, electronic image scanners, and electronic media).
- 6.2 **File Code:** Assign a file code to all documents being generated. The Subject Area codes are determined from the list in **Attachment 9.1**. Format for coding documents is:

IHnn.YY

where **nn** equals the IH Subject area code (type of task) 10 thru 106 from Appendix 9.1
YY equal the year the record is generated

Example: A report on Asbestos personal airborne fiber exposure monitoring in 2004, is given the following file code:

IH88.04

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6.3 Hazard Assessment & Employee Monitoring “Hardcopy” Records:

6.3.1 *IH Professional* notifies affected employees and their line management within 5 business days using *IH 60500 Attachment 9.4 5-day Employee Notification form*, or equivalent. Provide a copy to the *IH Monitoring Record Custodian*.

6.3.2 The *IH Professional* provides documentation for all personnel samples collected at BNL to the *IH Group Record Custodian* in the following manner:

- The original of photos, sketches, sampling sheets, etc
- The original of laboratory analysis reports, chain of custody forms, and field sampling forms, and meter log printouts
- Copies of exposure assessment reports and its attachments and exhibits.
- The *IH Professional* may keep unofficial copies of the files for personal reference. Copies of documents that are not the official record need to be marked “COPY”.
- The official copies of all records are to be kept by the *IH Group Record Custodian* in a manner approved by BNL record retention policy and in compliance with ESH&Q *Records Management Procedure* DH-ADM-002, SBMS *Records Management*, OSHA and DOE regulations. Approved storage is in metal file cabinets in Building 120 Room 1-20.

6.3.3 The *IH Professional* prepares a hazard assessment report of exposure monitoring or qualitative hazard assessments. It is highly desirable for it to be issued within 30 days of receipt of the sampling results. Provide a copy to the *IH Monitoring Record Custodian*.

6.4 **Employee Monitoring “Electronic” Records:** The *IH Professional* is to provide copies of all electronic documentation regarding the collection of area and personnel samples collected at BNL to the *IH Monitoring Record Custodian*. This includes text documents and electronic photo images. The *IH Monitoring Record Custodian* either:

- 6.4.1 Securely stores electronic files in a manner approved by BNL record retention policy and in compliance with OSHA and DOE regulations, or
- 6.4.2 Provide directions to the *IH Professional* on how to securely store electronic files in a manner approved by BNL record retention policy and in compliance with OSHA and DOE regulations.
- 6.4.3 The approved method in storage of the electronic record is to enter the file(s) into the SHSD “Shared Drive” \\Bnlnt2\shsd\Industrial Hygiene.

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6.4.4 The *IH Professional* may keep unofficial copies of electronic files for personal reference.

6.5 Program Documentation “Hardcopy & Electronic” Records:

- 6.5.1 The *IH Professional* who develops program level documentation, such as Self Assessments, SBMS documents, SOPs, and training material is to secure all electronic files and hardcopy documentation in the following manner.
- 6.5.2 The *IH Professional* is to securely store electronic files in a manner approved by BNL record retention policy and in compliance with OSHA and DOE regulations. The approved method in storage of the record is to enter a copy into the SHSD “Shared Drive” \\Bnlnt2\shsd\Industrial Hygiene.
- 6.5.3 The *IH Professional* is to provide a paper copy of the documentation to the *IH Group Administrative Record Keeper* for filing in the *Official* files in Building 120, Room 1-26. The *IH Group Administrative Record Keeper* enters the record into the *Document Log Database*.
- 6.5.4 The *IH Professional* may keep unofficial copies of electronic files for personal reference.

6.6 Transfer of records from Active Storage Areas to the *BNL Records Holding Area*. Records can be transferred to the *BNL Records Holding Area* after 6 months of non-use, at the end of a project, or at the end of the retention period. Obtain concurrence from the IH Group Leader prior to transferring records to the Holding Area.

- 6.6.1 Obtain appropriate storage box: PPM# S00490.
- 6.6.2 Place records in labeled folders.
- 6.6.3 Fill out a *Records Management Inventory Form* (found in SBMS Records Management). https://sbms.bnl.gov/sbmsearch/subjarea/97/97_Exh4.cfm?ExhibitID=6583
Volume: 1 letter size file drawer = 1.5 cu.ft.
Volume: 1 legal size file drawer = 2.0 cu.ft.
- 6.6.4 Determine the Site-Specific Record Schedule in Attachment 9.1 (based on the *SBMS Records Management*).
- 6.6.5 Forward the *Records Management Inventory Form* to *SHSD Records Representative* for entry into database.
- 6.6.6 Complete the *BNL Records Transmittal* form.
- 6.6.7 Call the Record Holding Area at x-7962 or x-5070 to arrange for transfer of the records.

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7.0 Implementation and Training

- 7.1 **Qualification Criteria for SHSD personnel:** All IH Group will be orally instructed in this procedure and require no further qualification documentation.
- 7.2 Qualification criteria for any other organization using this SOP will be developed by the department manager in accordance with current good industry practice.

8.0 References

- 8.1 BNL *Records Management* Subject area
- 8.2 ESH&Q *Records Management Procedure* DH-ADM-002

9.0 Attachments

- 9.1 IH Group Files Codes

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10.0 Documentation

Document Development and Revision Control Tracking		
Prepared By: <i>(signature/date on file)</i> R. Selvey 3/29/05 Certified Industrial Hygienist	Reviewed By / Date: <i>(signature/date on file)</i> S. Wiley 4/08/05 SHSD Records Manager	Approved By / Date: <i>(signature/date on file)</i> R. Selvey 04/12/05 Industrial Hygienist Group Leader
ESH Coordinator/ Date: <i>none</i>	Work Coordinator/ Date: <i>none</i>	SHSD Manager / Date <i>none</i>
QA Representative / Date: <i>none</i>	Training Coordinator / Date: <i>none</i>	Filing Code: IH60.05
Facility Support Rep. / Date: <i>none</i>	Environ. Compliance Rep. / Date: <i>none</i>	Effective Date: 04/13/05
ISM Review - Hazard Categorization <input type="checkbox"/> High <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> Low/Skill of the craft	Validation: <input type="checkbox"/> Formal Walkthrough <input checked="" type="checkbox"/> Desk Top Review <input type="checkbox"/> SME Review Name / Date:	IMPLEMENTATION: Training Completed: n/a Procedure posted on Web: Y Hard Copy" files updated: Y

Periodic Review Record		
Date of Review	Reviewer Signature and Date	Comments
<input type="checkbox"/> Temporary Change <input type="checkbox"/> Change in Scope <input type="checkbox"/> Periodic review <input type="checkbox"/> Clarify/enhance procedural controls		

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Attachment 9.1

IH Group File Codes

Based on the original ESH&Q Records Management Procedure Key to Filing Codes for Safety and Health Services - Industrial Hygiene (IH) Changes in Red are from additions/deletion from the ESH&Q Directorate List (which has been discontinued).

<u>Type of Task</u>	<u>Retention Time</u>
IH10 Administrative Records	-
11.1 Accounting: Credit Card Records, Purchase Requisitions, ILR	3 years
11.2 Budget Planning , Hire Reqs, Salary Administration	3 years
11.3 Equipment Records	3 years
12 Travel Records	6 years
IH20 Management Records	-
21 R2A2s	Until Superseded
22 Employee Goals	3 years
23 Performance Appraisals	3 years
24 Organization Charts	Until Superseded
25 Personnel Records	3 years
28 Building/Space Records	3 years
IH30 Internal IH Group Committees/Meetings Records	-
31 Staff Meeting Agenda/Minutes	3 years
32 Status Reports of IH Activities	3 years
35 IH Group Internal Ad hoc Teams/Committees	3 years
IH40 Audits/Appraisals/Assessments	-
41 Internal Appraisals/Assessments (SHSD of IH Programs)	10 years
42 External Audits/Appraisals/Assessments (BSA, BHSO, DOE, other)	10 years
IH50 Industrial Hygiene Program	-
51 Control and Calibration of Measuring/Test Equipment	75 years
52 Standard Operating Procedures (SOP's)	75 years
55 Field Service Delivery Program (Organization Alignment/Models)	3 years
56 IH Group's OHS Management System 18001	3 years
57 IH Group's EMS Management System 14001	3 years
IH60 IH Hazard Identification and Evaluation	-
61 Hazardous Materials Control Program	75 years

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62	Ventilation/Toxic Exhaust System Design/HEPA	75 years
63	Exposure Monitoring field records, custody, & lab analysis	75 years
64	Building Demolition/Remodel Testing	75 years
65	Employee Exposure Investigation initiated by 3 rd party requests	75 years
66	Work Planning/Permit Reviews	75 years
67	Construction/Project Design/ORR/ORE/ERE Reviews	75 years
68	Experimental Safety Reviews	75 years
69	SAR/SAD Reviews	75 years

IH70	Hazard Control Systems/Programs	-
71	Personal Protective Equipment Program	75 years
72	Respiratory Protective Equipment Program	75 years
72.1	Respirator Fit Test Records	75 years
75	Chemicals	
75.1	Chemicals (HAZCOM/Lab Standard Programs)	75 years
75.2	Chemicals (Chemical Specific Evaluations, Exposure Assessments, & Monitoring)	75 years
77	Chemical Management System / MSDS Inventory Programs	75 years

IH80-110	Specific Hazards with Control Programs	-
88	Asbestos	75 years
89	Biohazards	75 years
88	Carcinogens	75 years
91	Confined Spaces	75 years
92	Ergonomics	75 years
93	Lasers	75 years
94	Illumination (Visible Light)	75 years
95	Static Magnetic Fields	75 years
96	Noise and Hearing Conservation	75 years
97	Indoor Air Quality (Office Environments)	75 years
98	Pesticides	75 years
99	Non-Ionizing Radiation (IR, UV, ELF-VHF, RF and Microwave Radiation)	75 years
100	Sanitation	75 years
101	Temperature Extremes	75 years
102	Vibration	75 years
103	Lead	75 years
104	HazWop (including CERCLA HASP reviews)	75 years
105	ER (Emergency Response)	75 years
106	Beryllium	75 years